

**RFQ NO. 1587621 – QASP ADDENDUM 1 to
PERFORMANCE WORK STATEMENT (PWS)
FOIA Case Management System and Support Services**

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Quality Assurance Surveillance Plan

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**QUALITY ASSURANCE SURVEILLANCE PLAN
(QASP)**

1 INTRODUCTION

This quality assurance surveillance plan (QASP) is developed pursuant to the requirements listed in the performance work statement (PWS) entitled Performance Work Statement for FOIA Case Management System and Support Services. This plan sets forth the procedures and guidelines the Environmental Protection Agency (EPA), Office of General Counsel (OGC), National FOIA Office (NFO) will use to ensure that the required performance standards or services levels are achieved by the contractor.

1.1 Purpose

1.1.1 The purpose of the QASP is to describe the systematic methods used to monitor performance and to identify the required documentation and the resources to be employed. The QASP provides a means for evaluating whether the contractor is meeting the performance standards and quality levels identified in the PWS, QASP, and the Contractor's Quality Control Plan (QCP), and to ensure that the government pays only for the level of services received.

1.1.2 This QASP defines the roles and responsibilities of all members of the integrated project team (IPT), identifies the performance objectives, defines the methodologies used to monitor and evaluate the contractor's performance, describes quality assurance documentation requirements, and describes the analysis of quality assurance monitoring results.

1.2 Performance Management Approach

1.2.1 The PWS structures the acquisition around "what" service or quality level is required, as opposed to "how" the contractor should perform the work (i.e., results, not compliance). This QASP will define the performance management approach taken by the EPA's Office of General Counsel's National FOIA Office to monitor and manage the contractor's performance to ensure the expected outcomes or performance objectives communicated in the QASP are achieved. Performance management rests on developing a capability to review and analyze information generated through performance assessment. The ability to make decisions based on the analysis of performance data is the cornerstone of performance management; this analysis yields information that indicates whether expected outcomes for the project are being achieved by the contractor.

1.2.2 Performance management represents a significant shift from the more traditional quality assurance (QA) concepts in several ways. Performance management focuses on assessing whether outcomes are being achieved and to what extent. This approach migrates away from scrutiny of compliance with the processes and practices used to achieve the outcome. A performance-based approach enables the contractor to play a large role in how the work is performed and to determine if the proposed processes are within the stated constraints. The only exceptions to process reviews are those required by law and compelling business situations, such as safety and health. A "results" focus provides the contractor flexibility to continuously improve and innovate over the course of the contract if the critical outcomes expected are being achieved and the desired performance

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levels are being met.

1.3 Performance Management Strategy

1.3.1 The contractor is responsible for the quality of all work performed. The contractor measures that quality through the Contractor's Quality Control (CQC) program. CQC is work output, not workers, and therefore includes all work performed under this contract regardless of whether the work is performed by contractor employees or by subcontractors. The contractor's QCP will set forth the staffing and procedures for self-inspecting the quality, timeliness, responsiveness, customer satisfaction, and other performance requirements in the PWS. The contractor will develop and implement a performance management system with processes to assess and report its performance to the designated government representative. The contractor's QCP will set forth the staffing and procedures for self-inspecting the quality, timeliness, responsiveness, customer satisfaction, and other performance requirements in the PWS. This QASP enables the government to take advantage of the contractor's QC program.

1.3.2 The government representative(s) will monitor performance and review performance reports furnished by the contractor to determine how the contractor is performing against communicated performance objectives. The government will make determinations regarding incentives based on performance measurement metric data and notify the contractor of those decisions. The contractor will be responsible for making required changes in processes and practices to ensure performance is managed effectively.

2 ROLES AND RESPONSIBILITIES

2.1 The Contracting Officer

The Contracting Officer (CO) is responsible for monitoring contract compliance, contract administration, and cost control and for resolving any differences between the observations documented by the Contracting Officer's Representative (COR) and the contractor. The CO will designate one full-time COR as the government authority for performance management. The number of additional representatives serving as technical inspectors depends on the complexity of the services measured, as well as the contractor's performance, and must be identified and designated by the CO.

2.2 The Contracting Officer's Representative

The Contracting Officer's Representative (COR) is designated in writing by the CO to act as his or her authorized representative to assist in administering a contract. COR limitations are contained in the written appointment letter. The COR is responsible for technical administration of the project and ensures proper government surveillance of the contractor's performance. The COR is not empowered to make any contractual commitments or to authorize any contractual changes on the government's behalf. Any changes that the contractor deems may affect contract price, terms, or conditions shall be referred to the CO for action. The COR will have the responsibility for completing QA monitoring forms used to document the inspection and evaluation of the contractor's work performance. Government surveillance may occur under the inspection of services clause for any service relating to the contract.

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3 IDENTIFICATION OF REQUIRED PERFORMANCE STANDARDS/QUALITY LEVELS

The required performance standards and/or quality levels are included in the PWS and herein the QASP.

4 METHODOLOGIES TO MONITOR PERFORMANCE

4.1 Surveillance Techniques

To minimize the performance management burden, simplified surveillance methods shall be used by the government to evaluate contractor performance when appropriate. The primary methods of surveillance are (include those that apply)

- ▶ Random monitoring, which shall be performed by the COR designated inspector.
- ▶ 100% Inspection - Each month, the COR shall review the generated documentation and enter summary results into the Surveillance Activity Checklist.
- ▶ Periodic Inspection - COR typically performs the periodic inspection monthly.

4.2 Customer Feedback

The contractor is expected to establish and maintain professional communication between its employees and customers. The primary objective of this communication is customer satisfaction. Customer satisfaction is the most significant external indicator of the success and effectiveness of all services provided and can be measured through customer complaints.

Performance management drives the contractor to be customer focused through initially and internally addressing customer complaints and investigating the issues and/or problems, but the customer always has the option to communicate complaints to the CO and COR, as opposed to the contractor.

Customer complaints, to be considered valid, must set forth clearly and in writing the detailed nature of the complaint, must be signed, and must be forwarded to the COR. The COR will accept those customer complaints and investigate using the Quality Assurance Monitoring Form - Customer Complaint Investigation, identified in Enclosure 2.

Customer feedback may also be obtained either from the results of formal customer satisfaction surveys or from random customer complaints.

4.3 Acceptable Quality Levels

The Acceptable Quality Levels (AQLs) included in Enclosure 1, Performance Requirements Summary Table, for contractor performance are structured to allow the contractor to manage how the work is performed while providing negative incentives for performance shortfalls. For certain critical activities such as those involving services identified in Enclosure 1, the desired performance level is established at 100 percent. Other levels of performance are keyed to the relative importance of the task to the overall mission performance.

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5 QUALITY ASSURANCE DOCUMENTATION

5.1 The Performance Management Feedback Loop

The performance management feedback loop begins with the communication of expected outcomes. Performance standards are expressed in the PWS and are assessed using the performance monitoring techniques shown in Enclosure 1 hereto.

5.2 Monitoring Forms

The government's QA surveillance, accomplished by the COR, will be reported using the monitoring form in Enclosure 2. The forms, when completed, will document the government's assessment of the contractor's performance under the contract to ensure that the required results are being achieved.

5.2.1 The COR will retain a copy of all completed QA surveillance forms.

6 ANALYSIS OF QUALITY ASSURANCE ASSESSMENT

6.1 Determining Performance

6.1.1 Government shall use the monitoring methods cited to determine whether the performance standards/service levels have been met. If the contractor has not met the minimum requirements, it may be asked to develop a corrective action plan to show how and by what date it intends to bring performance up to the required levels.

6.2 Reporting

6.2.1 At the end of each month, the COR will prepare a written report summarizing the overall results of the quality assurance surveillance of the contractor's performance. This written report, which includes the contractor's submitted monthly report and the completed quality assurance monitoring forms (Enclosure 2), will become part of the QA documentation. It will enable the government to demonstrate whether the contractor is meeting the stated objectives and/or performance standards, including cost/technical/scheduling objectives.

6.3 Reviews and Resolution

6.3.1 The COR may require the contractor's project manager, or a designated alternate, to meet with the CO and/or COR and other government personnel as deemed necessary to discuss performance evaluation. The COR will define a frequency of in-depth reviews with the contractor, including appropriate self-assessments by the contractor; however, if the need arises, the contractor will meet with the COR as often as required or per the contractor's request. The agenda of the reviews may include:

- ▶ Monthly performance assessment data and trend analysis
- ▶ Issues and concerns of both parties
- ▶ Projected outlook for upcoming months and progress against expected trends, including a corrective action plan analysis
- ▶ Recommendations for improved efficiency and/or effectiveness

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- ▶ Issues arising from the performance monitoring processes

632 The COR must coordinate and communicate with the contractor to resolve issues and concerns regarding marginal or unacceptable performance.

633 The COR and contractor should jointly formulate tactical and long-term courses of action. Decisions regarding changes to metrics, thresholds, or service levels should be clearly documented. Changes to service levels, procedures, and metrics will be incorporated as a contract modification at the convenience of the CO.

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ENCLOSURE 1: PERFORMANCE REQUIREMENTS SUMMARY

QUALITY ASSURANCE SURVEILLANCE PLAN (QASP)

NOTES:

The following notes are applicable for all sections of this QASP.

- The percent of acceptable/unacceptable submissions for all the deliverables will be tracked by EPA. The Contractor shall provide notice to EPA in writing whenever the Contractor becomes aware that Performance Objectives are not, or will not be, achieved.
- If a report due date occurs on a weekend or Federal Holiday, the report shall be submitted the following business day.
- The EPA Contracting Officer's Representative (COR), or the Contracting Officer (CO), intends to assess the Performance Standards (PS) and Quality Assurance (QA) targets under each task in this QASP monthly before the Contractor's invoice is paid in accordance with the Prompt Payment Act of 1982.
- The Contractor shall be alerted, in writing, whenever Performance Objectives are not achieved.

QASP Performance Objectives:

Performance Objective 1 - A continuously operational and secure FOIA Case Management System providing uninterrupted access for all users.

Performance Objective 2 - A continuously accessible FOIA Case Management System providing uninterrupted access for all users.

Performance Objective 3 - Efficient, comprehensive compliance with the Freedom of Information Act reporting requirements to build public trust.

Performance Objective 4 - Timely resolution of reported issues to ensure a positive end-user experience.

Performance Objective 5 - A smooth transition between contractors at the start and end of the contract period of performance for seamless continuity of operations, system performance, and data integrity.

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Performance Objective 1 – A continuously operational and secure FOIA Case Management System providing uninterrupted access for all users.

PERFORMANCE OBJECTIVES & APPLICABLE TASKS	PERFORMANCE MEASURES	ACCEPTABLE QUALITY LEVELS & PERFORMANCE STANDARDS	METHOD OF SURVEILLANCE	INCENTIVES (Positive and/or Negative)
<p>Task 1 – The system must test and validate backup files to assure data backup access and data redundancy in case of a system failure.</p> <p><u>Desired Outcome:</u> Complete, tested, validated backup files.</p>	<p>The report is produced showing evidence of backups with data testing and data validation.</p> <p>Anomalies or issues identified when producing the report are documented and, as necessary, raised with EPA.</p> <p>EPA shall be provided evidence of a standard of completed tests used to provide validated backup files at an accuracy rate of 100%.</p>	<p>The report is produced and submitted on the first and third Tuesday of each month starting 30 days after ATO approval and on schedule one hundred percent (100%) of the time.</p> <p>Anomalies and issues are highlighted in the report, if appropriate, one hundred percent (100%) of the time.</p>	<p>COR/ACOR provides feedback regarding problems associated with meeting performance measures.</p> <p><u>Measured = twice monthly</u></p>	<p>When performance meets the standard, the contractor will earn consideration in the award of subsequent options and/or task orders, or optional projects and will be factored into the annual evaluation of performance.</p> <p>When performance is below the standard, a corrective notice will be provided to the contractor with a timeline for corrective action.</p>

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Performance Objective 2 - A continuously accessible FOIA Case Management System providing uninterrupted access for all users.

PERFORMANCE OBJECTIVES & APPLICABLE TASKS	PERFORMANCE MEASURES	ACCEPTABLE QUALITY LEVELS & PERFORMANCE STANDARDS	METHOD OF SURVEILLANCE	INCENTIVES (Positive and/or Negative)
<p>Task 2 - The system must be continuously accessible through the internet for EPA and public users.</p> <p><u>Desired Outcome:</u> On-demand access with 2 % unscheduled downtime.</p>	<p>The report is produced showing proof of the number of hours the system is fully operational and accessible.</p> <p>Anomalies or issues identified when producing the report are documented and, as necessary, raised with EPA.</p> <p>EPA expects a standard accessibility rate of 100%.</p>	<p>The report is produced and submitted on the first and third Tuesday of each month starting 30 days after ATO approval and on schedule one hundred percent (100%) of the time.</p> <p>Anomalies and issues are highlighted in the report, if appropriate, one hundred percent (100%) of the time.</p>	<p>COR/ACOR provides feedback regarding problems associated with meeting performance measures.</p> <p><u>Measured = twice monthly</u></p>	<p>When performance meets the standard, the contractor will earn consideration in the award of subsequent options and/or task orders and will be factored into the annual evaluation of performance.</p> <p>When performance is below the standard, a corrective notice will be provided to the contractor with a timeline for corrective action.</p>

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Performance Objective 3 – Efficient, comprehensive compliance with the Freedom of Information Act reporting requirements to build public trust.

PERFORMANCE OBJECTIVES & APPLICABLE TASKS	PERFORMANCE MEASURES	ACCEPTABLE QUALITY LEVELS & PERFORMANCE STANDARDS	METHOD OF SURVEILLANCE	INCENTIVES (Positive and/or Negative)
<p>Task 3 - The system must accurately compile data and perform calculations in accordance with Department of Justice (DOJ) guidelines for the FOIA Annual Report.</p> <p><u>Desired Outcome:</u> An accurate, validated DOJ Annual Report</p>	<p>The report is produced showing proof of compiled, validated data required to produce the DOJ Annual and Quarterly Reports.</p> <p>Anomalies or issues identified when producing the report are documented and, as necessary, raised with EPA.</p> <p>EPA expects a standard accuracy rate of 100%.</p>	<p>The report is produced and submitted the first Tuesday of each month starting 30 days after ATO approval and on schedule one hundred percent (100%) of the time.</p> <p>Anomalies and issues are highlighted in the report, if appropriate, one hundred percent (100%) of the time.</p>	<p>COR/ACOR provides feedback regarding problems associated with meeting performance measures.</p> <p><u>Measured = monthly</u></p>	<p>When performance meets the standard, the contractor will earn consideration in the award of subsequent options and/or task orders and will be factored into the annual evaluation of performance.</p> <p>When performance is below the standard, a corrective notice will be provided to the contractor with a timeline for corrective action.</p>

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Performance Objective 4 - Timely resolution of reported issues to ensure positive end-user experience.

PERFORMANCE OBJECTIVES & APPLICABLE TASKS	PERFORMANCE MEASURES	ACCEPTABLE QUALITY LEVELS & PERFORMANCE STANDARDS	METHOD OF SURVEILLANCE	INCENTIVES (Positive and/or Negative)
<p>Task 4 - The system must produce and report help-desk data and information</p> <p><u>Desired Outcome:</u> Timely resolution of reported issues with no customer complaints.</p>	<p>The report is produced showing proof of the number of help-desk tickets received, the requester category (public or EPA user), the issue category, acknowledgement-of-receipt response time, resolution category, and the time to reach resolution, with resolution achieved on average within 1 hour and with a standard deviation of no greater than 2 hours.</p> <p>Anomalies or issues identified when producing the report are documented and, as necessary, raised with EPA.</p> <p>EPA expects a standard accuracy rate of 100%.</p>	<p>The report is produced and submitted the first Tuesday of each month starting 30 days after ATO approval and on schedule one hundred percent (100%) of the time.</p> <p>Anomalies and issues are highlighted in the report, if appropriate, one hundred percent (100%) of the time.</p>	<p>COR/ACOR provides feedback regarding problems associated with meeting performance measures.</p> <p><u>Measured = monthly</u></p>	<p>When performance meets the standard, the contractor will earn consideration in the award of subsequent options and/or task orders and will be factored into the annual evaluation of performance.</p> <p>When performance is below the standard, a corrective notice will be provided to the contractor with a timeline for corrective action.</p>

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Performance Objective 5 - A smooth transition between contractors at the start of the contract period of performance for seamless continuity of operations, system performance, and data integrity.

PERFORMANCE OBJECTIVES & APPLICABLE TASKS	PERFORMANCE MEASURES	ACCEPTABLE QUALITY LEVELS & PERFORMANCE STANDARDS	METHOD OF SURVEILLANCE	INCENTIVES (Positive and/or Negative)
<p>Task 5 - The system must complete data migration and validate that data integrity is 99.9% acceptable to EPA.</p> <p><u>Desired Outcome:</u> Continuity of operations, acceptable system performance, and 99.9% data integrity.</p>	<p>The report is produced showing proof of migration status, including the data model used, data importation scripts, data mapping requirements and procedures, and provide EPA access to newly imported data.</p> <p>Anomalies or issues identified when producing the report are documented and, as necessary, raised with EPA.</p> <p>EPA expects a standard accuracy rate of 99.9% for data integrity.</p>	<p>The report is produced and submitted on the first Tuesday of each month starting 30 days after ATO approval and on schedule one hundred percent (100%) of the time.</p> <p>Anomalies and issues are highlighted in the report, if appropriate, one hundred percent (100%) of the time.</p>	<p>COR/ACOR provides timely feedback regarding problems associated with meeting performance measures.</p> <p><u>Measured = Monthly</u></p>	<p>When performance meets the standard, the contractor will earn consideration in the award of subsequent options and/or task orders and will be factored into the annual evaluation of performance.</p> <p>When performance is below the standard, a corrective notice will be provided to the contractor with a timeline for corrective action.</p>

